IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

First Named
Inventor  :   Arul A. Menezes

Appln. No.:  09/899,554

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For     :    AUTOMATIC EXTRACTION OF              Examiner: Huyen X Vo
             TRANSFER MAPPINGS FROM
             BILINGUAL CORPORA

Docket No.:  M61.12-0366

## PRE-APPEAL BRIEF REQUEST FOR REVIEW

**Mail Stop AF**
Commissioner for Patents
P.O. Box 1450                                       Via filing online
Alexandria, VA 22313-1450

Sir:

Applicants respectfully request a Pre-Appeal Brief Review of the rejection of claims 1-54.

Applicants request a pre-appeal brief conference to review the outstanding rejections made to claims 1-54 of the current application in a Final Office Action (hereinafter "Final Action") mailed on December 11, 2006. This document is provided in support of this request.

Claims 1-41 stand rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. The Applicants respectfully disagree with the rejection. Nevertheless, in a Response and Amendment After Final transmitted to the Office on January 29, 2007 (hereinafter "Response"), the Applicants amended claim 1 to address the alleged § 101 issues. On pages 14-15 of the Response, Applicants indicate that the Final Action provides a guideline for statutory subject matter. The Applicants indicate that the amendments made to claims 1 and 24 conform to the guidelines set forth in the Final Action and that claims 1 and 24 are directed to statutory subject matter. In addition, claims 2-23 and 25-41, which depend from claims 1 and 24 either directly or indirectly are likewise directed to statutory subject matter.

In the Advisory Action mailed on February 22, 2007 (hereinafter "Advisory Action") no specific mention is made of the status of claims 1-41, although the Advisory Action does indicate that the Response was entered and that the application is allegedly not in condition for allowance (see item 11 of the Advisory Action). Applicants thus assert that no prima facie case has been established to reject claims 1-41 as amended and that their rejection is clearly erroneous. Applicants thus request that the rejection be withdrawn and that claims 1-41 be allowed.

Claims 42-54 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent 5,477,450 of Takeda et al. (hereinafter "Takeda"). Applicants assert that this rejection is clearly erroneous because a prima facie case that Takeda teaches all of the recited features of claims 42-54 has not been made.

On pages 16-20 of the Response, the Applicants identify why the rejection of these claims is erroneous. To begin with, the Applicants pointed out in the Response on pages 16-17 that independent claim 42 recites a plurality of mappings. Furthermore, as recited, at least some of the mappings correspond to "dependency structures of [a] first language having varying context with some common elements, and associated dependency structures of [a] second language to the dependency structures of the first language also having varying context with some common elements." (Emphasis in original.) That is, as is pointed out on page 17 of the response, "the dependency structures in each of the first and second language ... have context, and that common elements in different mapping are provided in varying context." (Emphasis added.) The Applicants further point out that Takeda recognizes that a dependency structure is "'a representation of the structure of a text in terms of dependency between the main element of the text and the other constituents.'" (Response, page 19, quoting Takeda at col. 6, ll. 45-47.)

Applicants assert that neither the Final Action nor the Advisory Action makes a prima facie case that Takeda teaches dependency structures in each of first and second languages have varying context with some common elements. The Final Action on page 4 asserts that Takeda, at col. 10, ll. 5-17, teaches "mappings" with "dependency structures of the first language having varying context with some common elements" and "associated dependency structures of the

second language having varying context with some common elements". However, as the Applicants point out on page 20 of the Response, the referenced language at col. 10 of Takeda describes a constraint solver that "has no apparent mapping with association between [an] input language and [a] translated language. Instead, the constraint solver appears to function independent of the input language." (Emphasis in Original.) Even if the constraint solver discussed at col. 10 of Takeda teaches a dependency structure with varying context with some common elements in one language (the target language) it does not teach similar dependency structures in another language (the source language). Furthermore, because the constraint solver is independent of the source language, the constraint solver fails to teach an association between dependency structures of the source and target languages. Applicants therefore assert that the assertion made in the Final Action that the constraint solver teaches the features described above is clearly erroneous.

The Final Action also asserts on page 4 that a bilingual dictionary indicates mappings between the source language "where each word in the source language corresponds to more than one words in the target language." Again, however, the Applicants assert that Takeda here fails to teach an association between dependency structures of the source and target languages wherein dependency structures in each of the source and target languages have "varying context with some common elements."

The Advisory Action states as its basis for maintaining the rejection that "[i]nput text is analyzed and compared with the bilingual dictionary, which contains many entries with each entry in association (or mappings) with elements of the target language." The Applicants point out that the Advisory Action fails to assert that there is any varying context in dependencies in the source language and therefore fail to provide a prima facie case that Takeda anticipates claim 42 under § 102(b). Applicants assert that this is because there is no context in the source language of a dictionary. Rather, a single word is provided in the source language, and translations are provided in the target language as is shown in col. 7 of Takeda. A single word such as "rajio" or "okii" cannot provide context. Dictionaries of the type described in Takeda

provide definitions or translations that are free from context. As discussed above, Takeda provides a definition of what a dependency structure is, namely, a representation of the structure of a text in terms of dependency between the main element of the text and the other constituents. In view of Takeda's own definition, the Applicants assert that single word entries in a dictionary are not "dependency structures" because they provide no representation of a dependency between a main element and other constituents. To assert that a dictionary has the dependency structures of the type recited in claim 42, then, is clearly erroneous.

Thus, the Applicants assert that neither the Final Action nor the Advisory Action, either alone or in combination, teach or suggest all of the elements of claim 42 and that to assert otherwise is clearly erroneous. Applicant's request that the rejection of claim 42 and its dependent claims 43-54 be withdrawn and that claims 42-54 be allowed.
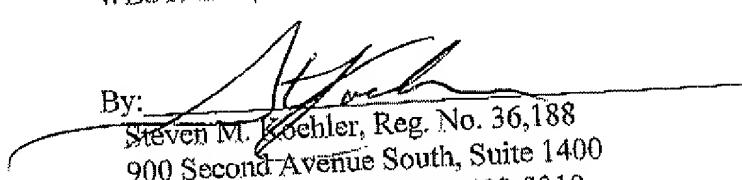
In view of the foregoing, Applicants respectfully request reconsideration and allowance of claims 1-54. Favorable action upon all claims is solicited.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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